

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

TEJA RAVI, *et al.*,

Plaintiffs,

v.

THE UNITED STATES,

Defendant.

No. 20-1237  
(Judge Armando O. Bonilla)

JOINT STATUS REPORT

Pursuant to the Court's Discovery Scheduling Order (ECF 79), the parties hereby submit this status report regarding the status of discovery.

Responses to Discovery Requests. Defendant requested a 28-day extension of its deadline to respond to plaintiffs' initial interrogatories and document requests; in response, plaintiffs requested a 31-day extension of their deadline to respond to defendant's first set of document requests and interrogatories. Accordingly, the parties have agreed to exchange responses to their initial discovery requests on June 2, 2025. Plaintiffs have been preparing their responses to defendant's requests, and defendant has been preparing its responses to plaintiffs and begun its collection of documents.

Defendant's Additional Statement. As defendant recently discussed with plaintiffs, it intends to seek leave to amend its answer to add an additional affirmative defense of waiver. In addition, plaintiffs' document requests implicate the production of documents that may be covered by the Privacy Act (5 U.S.C. § 552a), which the protective order currently in place does not address. As such, defendant anticipates asking the Court to modify the protective order to address that issue. Defendant will confer with plaintiffs' counsel regarding any such modification prior to filing any motion with the Court.

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May 2, 2025

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